

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:)	Chapter 7
)	
JTR1, LLC, f/d/b/a JTR, LLC,)	Case No. 20-30141
)	
)	
Debtor.)	
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)	
A. Burton Shuford, Trustee of the)	
Bankruptcy Estate of JTR1, LLC,)	
f/d/b/a JTR, LLC,)	
)	
Plaintiff,)	
)	
v.)	Adv. Proc. No. 22-03018
)	
BJS Insurance, LLC, and)	
JJM, LLC,)	
)	
Defendants.)	
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**RESPONSE OF BJS INSURANCE, LLC AND JJM, LLC TO
PENSION BENEFIT GUARANTY CORPORATION'S MOTION TO INTERVENE**

Defendants BJS Insurance, LLC and JJM, LLC (together, the “Defendants”), by and through undersigned counsel, hereby submit this response (the “Response”) to the *Motion to Intervene or Otherwise be Heard on the Trustee’s Motion for Relief from Judgment and any Related Appeal* [Doc. 27] (the “Motion”) filed by the Pension Benefit Guaranty Corporation (the “PBGC”).

In support of this Response, Defendants hereby join in all respects and incorporate by reference the arguments set forth in the *Defendants’ Response to Pension Benefit Guaranty Corporation’s Motion to Intervene* filed by the defendants in Adv. Proc. No. 22-03004 [Doc. 29] and by the defendants in Adv. Proc. No. 22-03008 [Doc. 30] (the “Kearns and Mullady”).

Responses”), copies of which are attached hereto as Exhibit A. For the reasons discussed in the Kearns and Mullady Responses, Defendants request that the Court deny the PBGC’s Motion.

This is the 8th day of September, 2022.

K&L GATES, LLP

/s/ Margaret R. Westbrook

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